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Treasury Sanctions Key Actors in Iran's Oil Sector for Supporting Islamic Revolutionary Guard Corps-Qods Force

SERVICES

Treasury Designates Iranian Ministry and Minister of Petroleum, National Iranian Oil

October 26, 2020

Company, and National Iranian Tanker Company **Washington** – Today, the U.S. Department of the Treasury's Office of Foreign Assets Control

(OFAC) is designating the Iranian Ministry of Petroleum, the National Iranian Oil Company (NIOC), and the National Iranian Tanker Company (NITC) pursuant to E.O. 13224, as amended, a counterterrorism authority, for their financial support to Iran's Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF), an entity designated under E.O. 13224. Senior NIOC and NITC personnel have worked closely with Rostam Ghasemi, a senior IRGC-QF official and former Minister of Petroleum who was designated in 2019, and who has assumed a portion of former IRGC-QF Commander Qasem Soleimani's role in facilitating shipments of oil and petroleum products for the financial benefit of the IRGC-QF. OFAC is also designating multiple entities and individuals associated with the Ministry of Petroleum, NIOC, and NITC, including front companies, subsidiaries, and senior executives. In addition, OFAC is designating four persons involved in the recent sale of Iranian gasoline to the illegitimate Maduro regime in Venezuela. "The regime in Iran uses the petroleum sector to fund the destabilizing activities of the

support for terrorist entities and its nuclear program over the needs of the Iranian people." In spring 2019 alone, an IRGC-QF-led network employed more than a dozen NITC vessels to transport nearly 10 million barrels of crude oil, mostly destined for the Assad regime. Iran

continues to perpetuate the Syrian conflict with these kinds of transactions. These

shipments, taken collectively, sold for the equivalent of more than half a billion dollars.

Today's action targets those who supply and transport the oil that generates revenue for

IRGC-QF," said Secretary Steven T. Mnuchin. "The Iranian regime continues to prioritize its

the IRGC-QF. NIOC, NITC, AND MINISTRY OF PETROLEUM NIOC, overseen by the Ministry of Petroleum, is responsible for the exploration, production, refining, and export of oil and petroleum products in Iran. NITC, a subsidiary of NIOC, is responsible for the transportation of Iranian crude exports. NIOC and NITC provide both the oil and tankers for the sale of Iranian oil by the IRGC-QF. The cooperation and

coordination between the IRGC-QF and these entities extends well beyond the simple sale of oil, including coordination between **NIOC** and the Central Bank of Iran to facilitate the collection of tens of millions of dollars in proceeds from the sale of oil that benefitted the IRGC-QF.

NITC has also played a significant role in oil deals used to generate revenue for the IRGC-QF

and Hizballah. NITC personnel coordinated with the IRGC-QF on the loading of oil provided

by NIOC, and NITC Managing Director Nasrollah Sardashti (Sardashti) worked with

Hizballah on logistics and pricing for oil shipments to Syria. **Sardashti** also worked with Qatirji Group representative Viyan Zanganeh (Zanganeh) and a senior IRGC-QF official to facilitate the shipment of millions of dollars of oil by NITC. In 2018, OFAC designated Syrian regime-affiliated Qatirji Group for facilitating fuel trades between the Syrian regime and the Islamic State of Iraq and al Sham (ISIS), including providing oil products to ISIS-controlled territory. As of early 2020, the Qatirji Group's Zanganeh continued to work closely with the IRGC-QF to coordinate NIOC's provision of millions of barrels of oil and petroleum products to be shipped to Syria, as well as millions of dollars in payments back to Iran. In mid-2020, Zanganeh continued to act as an intermediary between the IRGC-QF and a Syrian regimeaffiliated business, arranging for the funding of the release of a seized vessel and additional shipments of fuel oil.

shipments to Syria, and in mid-2020 the IRGC-QF and senior regime officials coordinated to use the **Ministry of Petroleum** to procure U.S. dollars for the benefit of the IRGC-QF. Furthermore, in order to obfuscate its involvement in shipping activity, **NITC** set up a front company in the United Arab Emirates (UAE), Atlas Ship Management. NITC officials also

The Iranian Ministry of Petroleum has been used by individuals at the highest levels of the

NIOC, NITC, the Ministry of Petroleum, and Viyan Zanganeh are being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, the IRGC-QF. The Ministry of Petroleum is also being designated pursuant to E.O. 13224, as amended, for owning or controlling, directly or indirectly, **NIOC**.

KEY FACILITATORS AND ASSOCIATED ENTITIES Ali Akbar Purebrahim (Purebrahim), managing director of NIOC's Switzerland-based

subsidiary Naftiran Intertrade Company (NICO), has worked with the IRGC-QF on petroleum sales contracts, and worked with senior IRGC-QF official Ghasemi to arrange the shipment

NICO carried thousands of tons of liquified petroleum gas (LPG) belonging to **NIOC** as part of an arrangement to transport multiple shipments of LPG per month. **Ali Akbar Purebrahim** is being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, Rostam Ghasemi.

Refining Company, Imam Khomeini Shazand Oil Refining Company, and the National Petrochemical Company (NPC) are being designated pursuant to E.O. 13224, as amended, for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, the Ministry of Petroleum. OFAC is targeting several leaders or officials of the designated entities, all of whom are being designated pursuant to E.O. 13224, as amended, including: Minister of Petroleum

Sadiqabadi, for being a leader or official of NIORDC; and NPC Managing Director Behzad Mohammadi, for being a leader or official of the NPC. OFAC is also identifying the vessels **Longbow Lake** and **Wu Xian** as property in which **NIOC** has an interest. **GASOLINE SHIPMENTS TO VENEZUELA**

subsidiary NIOPDC, Madanipour and Mobin chartered multiple vessels to support the transport of tens of thousands of metric tons of gasoline destined for Venezuela. **Mobin International Limited** is being designated pursuant to E.O. 13224, as amended, for

having materially assisted, sponsored, or provided financial, material, or technological

support for, or goods or services in support of, the NIOPDC. Mahmoud Madanipour is

state-owned oil company Petroleos de Venezuela, S.A. (PdVSA) to ship gasoline obtained

from **NIOC** to the illegitimate Maduro regime in Venezuela. Upon the request of **NIOC**'s

Holding Limited and Oman Fuel Trading Ltd. Mobin Holding Limited and Oman Fuel Trading Ltd are being designated for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, **Mahmoud Madanipour**. **SANCTIONS IMPLICATIONS**

transactions with them. Any entities that are owned, directly or indirectly, 50 percent or more by such persons are also blocked. In addition, foreign financial institutions that knowingly facilitate significant transactions for, or persons that provide material or certain other support to, the persons designated today risk exposure to sanctions that could sever their access to the U.S. financial system or block their property and interests in property under U.S. jurisdiction.

Concurrent with today's action, OFAC is issuing amended General License 8A, issued pursuant to the Global Terrorism Sanctions Regulations and the Iranian Transactions and Sanctions Regulations, to continue to allow certain humanitarian trade transactions involving NIOC or any entities in which it owns, directly or indirectly, a 50 percent or greater interest. View additional information on the individuals and entities designated and vessels

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Iranian regime to facilitate the IRGC-QF's revenue generation scheme. In mid-2019, the Ministry of Petroleum arranged the loading of hundreds of thousands of barrels of oil for

arranged to create a separate UAE-based front company, Atlantic Ship Management **Company**, ostensibly as an entity to replace **Atlas Ship Management**.

Atlas Ship Management and Atlantic Ship Management Company are being designated pursuant to E.O. 13224, as amended, for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, **NITC**.

of oil, including pricing and payment for the shipment. Under **Purebrahim**'s leadership,

OFAC is also designating key subsidiaries of the Ministry of Petroleum. The **National** Iranian Oil Refining and Distribution Company (NIORDC), National Iranian Oil Products

Distribution Company (NIOPDC), Iranian Oil Pipelines and Telecommunications

Company, National Iranian Oil Engineering and Construction Company, Abadan Oil

Bijan Zanganeh, for being a leader or official of the Ministry of Petroleum; NIOC Managing

Director Masoud Karbasian, for being a leader or official of NIOC; NITC Managing Director

Nasrollah Sardashti, for being a leader or official of NITC; NIORDC Director Alireza

In January 2020, Mahmoud Madanipour (Madanipour) and UAE-based Mobin International Limited (Mobin) entered into an agreement with designated Venezuelan

being designated for having acted or purposed to have acted for or on behalf of, directly or indirectly, **Mobin International Limited**. OFAC is also targeting two United Kingdom-based companies of Madanipour; Mobin

jurisdiction are blocked, and U.S persons are generally prohibited from engaging in

All property and interests in property of these persons designated today subject to U.S.

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